

Presentment Date and Time: June 12, 2009 at 4:00 p.m. (Prevailing Eastern Time)  
Objection Date and Time: June 12, 2009 at 12:00 p.m. (Prevailing Eastern Time)  
Hearing Date and Time: June 17, 2009 at 2:00 p.m. (Prevailing Eastern Time)

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acting as agent for various funds

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	)	
	)	
In re:	)	Chapter 11
	)	
Lehman Brothers Holdings Inc., <u>et al.</u>	)	Case No. 08-13555 (JMP)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	

**JOINDER OF GALLIARD CAPITAL MANAGEMENT, INC., ACTING AS AGENT  
FOR VARIOUS FUNDS, TO THE OBJECTION OF WELLS FARGO & COMPANY  
AND WELLS FARGO BANK, NATIONAL ASSOCIATION TO THE MOTION OF THE  
DEBTORS, PURSUANT TO SECTION 502(b)(9) OF THE BANKRUPTCY CODE AND  
BANKRUPTCY RULE 3003(c)(3), FOR ESTABLISHMENT OF THE DEADLINE FOR  
FILING PROOFS OF CLAIM, APPROVAL OF THE FORM AND MANNER OF  
NOTICE THEREOF AND APPROVAL OF THE PROOF OF CLAIM FORM**

Galliard Capital Management, Inc., acting as agent for various funds (“Galliard”),  
by and through their undersigned counsel, for their joinder to the objection (the “Objection”) of  
Wells Fargo & Company and Wells Fargo Bank, National Association (together, “Wells Fargo”),  
to the Debtors’ motion (the “Bar Date Motion”), pursuant to section 502(b)(9) of the Bankruptcy  
Code and Bankruptcy Rule 3003(c)(3), for establishment of the deadline for filing proofs of

claim, approval of the form and manner of notice thereof and approval of the proof of claim form, respectfully states as follows:

1. Upon information and belief, Galliard and Lehman Brothers Special Financing Inc. are counterparties to certain swap agreements that are guaranteed by Lehman Brothers Holdings Inc.

2. Galliard has reviewed the Objection filed by Wells Fargo and hereby joins in Wells Fargo's Objection and adopts the various positions set forth therein.

WHEREFORE, for the reasons set forth herein, Galliard respectfully requests that this Court (i) deny the Bar Date Motion, (ii) establish a bar date to occur on or following October 31, 2009, (iii) provide that the submission of Official Form No. 10 shall be sufficient for purposes of satisfying the proof of claim requirement, and (iv) grant such other and further relief as this Court may deem just or proper.

Dated: New York, New York  
June 11, 2009

/s/ Lauren Attard

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